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16 *Attorneys for Defendant/Counterclaimant*  
17 *Ivan Tapia and Defendants Angela Cruikshank,*  
18 *Jeff Cruikshank, and Justin Owens*

19 **UNITED STATES DISTRICT COURT**  
20 **DISTRICT OF NEVADA**

21 INTERNATIONAL MARKETS LIVE INC.,  
22 a New York corporation dba IM MASTERY  
23 ACADEMY,

24 Plaintiff,

25 v.

26 DAVID IMONITIE an individual; SPELA  
27 SLUGA, an individual; DEVON ROESER,  
28 an individual; IVAN TAPIA, an individual;  
NVISIONU, INC., a Delaware corporation;  
ILYKIT, LLC, a Utah limited liability  
company, LUCAS LONGMIRE, an  
individual; NATHAN SAMUEL, an  
individual; MICHAEL ZHOR, an individual;  
IMRAN RICHIE, an individual; JUSTIN  
OWENS, an individual; PAULO  
CAVALLERI, an individual; JOSE  
MIGUEL CONTREAS, an individual; BASS  
GRANT, an individual; ANGELA  
CRUIKSHANK, an individual; JEFF  
CRUIKSHANK, an individual; VINCE  
MURPHY, an individual; GARY  
MCSWEEN, an individual; KATRINA

Case No.: 2:22-CV-01863-GMN-BNW

**STIPULATION AND [PROPOSED]  
ORDER RE: EXTENSION OF TIME FOR  
FILING OF REPLY TO RESPONSE (ECF  
No. 229) TO MOTION TO COMPEL (ECF  
NO. 203) (FIRST REQUEST)**

1 WORGESS, an individual; LUIS  
 2 RONALDO HARNANDEZ ARRIAGA, an  
 3 individual; STEPHANIA AYO, an  
 4 individual; SILVIA AYO, an individual;  
 5 CATALINA VASQUEZ, an individual;  
 6 MATHIAS VASQUEZ, an individual;  
 7 DOES 1 through 10, inclusive; and ROE  
 8 CORPORATIONS I through X, inclusive,  
 9  
 10 Defendants.

11 AND ALL RELATED MATTERS  
 12

13 **STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR FILING**  
 14 **OF REPLY TO RESPONSE (ECF No. 229) TO MOTION TO COMPEL (ECF NO. 203)**  
 15 **(FIRST REQUEST)**

16 Defendant/Counterclaimant Ivan Tapia (“Tapia”) and Plaintiff/Counterdefendant  
 17 International Markets Live Inc. (“IML”), (collectively, the “Parties”) by and through their  
 18 respective undersigned counsel of record, the law firms of Slighting Law, James Dodge Russell &  
 19 Stephens PC, Kerr Simpson Attorneys at Law, and Holland & Hart LLP, hereby stipulate and agree  
 20 to: 1) extend the deadline for Tapia to reply to IML’s Response (ECF No. 229) to Tapia’s Motion  
 21 to Compel (ECF. No. 203) from July 19, 2023 to **July 26, 2023**. This is the first stipulation to  
 22 extend the reply deadline. The Parties hereby specifically agree and stipulate as follows:

23 WHEREAS, on June 19, 2023, Tapia filed his Motion to Compel (Motion to Compel – ECF  
 24 No. 203).

25 WHEREAS, on July 3, 2023, the Parties stipulated to allow IML an extension of time to file  
 26 its Response to the Tapia’s Motion to Compel, with the Court entering an Order on July 5, 2023  
 27 reflecting the Parties’ stipulation (ECF No. 220).  
 28

1 WHEREAS, on July 12, 2023, IML filed its Response to Tapia's Motion to Compel  
2 (Response – ECF No. 229), thereby making Tapia's Reply to IML's Response currently due July  
3 19, 2023.

4 WHEREAS, on July 18, 2023, counsel for the Parties met and conferred via text message  
5 and agreed to allow Tapia an additional one (1) week to file his reply to IML's Response, thereby  
6 extending the deadline for his Reply from July 19, 2023 to July 26, 2023.

7  
8 WHEREAS, no parties oppose the extension of time for the filing of Tapia's reply to IML's  
9 Response as set forth herein.

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THEREFORE, the Parties stipulate and agree to extend Tapia's reply deadline from July 19, 2023 to **July 26, 2023** and respectfully request that the Court approve and order the same.

IT IS SO STIPULATED this 21<sup>st</sup> day of July 2023.

SLIGHTING LAW

HOLLAND & HART LLP

/s/ Bradley S. Slighting

/s/ Jenapher Lin

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*ROESER; NVISIONU, INC., Bass Grant,*

*Lucas Longmire, Vince Murphy*

**IT IS SO ORDERED:**



UNITED STATES MAGISTRATE JUDGE

DATED: July 24, 2023

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 21<sup>st</sup> day of July, 2023, a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR FILING OF REPLY TO RESPONSE (ECF No. 229) TO MOTION TO COMPEL (ECF NO. 203) (FIRST REQUEST)** was filed with the Clerk of the Court using the CM/ECF system which automatically sent notification of such filing to and served electronically upon the following counsel:

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